

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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COUNTER TERRORIST GROUP US and J. K. : Index No. 07-CV-6299 (DAB)  
IDEMA, :  
  
Plaintiffs, :  
  
v. : DECLARATION OF  
ASSOCIATED PRESS, ASSOCIATED PRESS TV : DAVID A. SCHULZ  
NEWS, PAUL HAVEN STEPHEN GRAHAM, :  
JASON STRAZZIO, AMIR SHAH, JOHN DOES 1- :  
7. :  
  
Defendants. :  
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I, David A. Schulz, hereby declare, under penalty of perjury as follows:

1. I am a member of Levine Sullivan Koch & Schulz, L.L.P., counsel herein for defendants The Associated Press and Associated Press Television News, Inc. (collectively "AP"). I make this declaration to set before the Court unreported decisions and court records cited in the accompanying memorandum of law in support of AP's motion to dismiss the verified complaint.

2. On March 17, 2005, plaintiff J.K. Idema filed in this Court a verified petition for a writ of habeas corpus. *Idema v. Rice*, No. 05-2947 (S.D.N.Y) (Hellerstein J.). True and correct copies of relevant excerpts from this verified petition are annexed hereto as Exhibit A. (The full petition is electronically available via PACER at *Idema v. Rice*, No. 1:05-cv-02064-EGS, D.D.C., Docket Entry No. 14, Ex. A, Parts 1 and 2.)

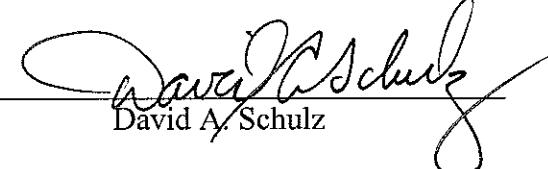
3. Annexed hereto are true and correct copies of the following unreported orders:

Exhibit    Description

- B      *Bennett v. Columbia Univ.*, No. BC345094 (Los Angeles Super. Ct. May 15, 2006), order dismissing claims by Idema and awarding defendants their attorney's fees.
- C      *Idema v. Fox News Network LLC*, No. BC 296228 (Los Angeles Super. Ct. Feb. 6, 2004), order dismissing claims by Idema and awarding defendants their attorney's fees.
- D      *Idema v. Fox News Network LLC*, No. BC 296228 (Los Angeles Super. Ct. July 18, 2005), order awarding attorneys fees as sanction for discovery violations by Idema.
- E      *Glosson v. Equifax Credit Info. Servs.*, No. 5:95-CV-104 (E.D.N.C. Apr. 28, 1997), order imposing Rule 11 sanctions on Idema.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 25, 2007

  
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David A. Schulz